#### FEDERAL ELECTION COMMISSION

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OFFICE OF GENERAL

COUNSEL

In the matter of:

U.S. Dry Cleaning Corporation
David Vitter
David Vitter for U.S. Senate

MUR No. 6279

#### COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW"), Anne Weismann, and Wayne Jerry Phillips bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against U.S. Dry Cleaning Corporation, David Vitter, and David Vitter for U.S. Senate for direct and serious violations of the Federal Election Campaign Act ("FECA").

# **Complainants**

- 2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government desisions and in the governmental desision-resising process. CREW uses a combination of research, litigatian, and advocacy to advance its mission.
- 3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws. Through its website, press reference, and other methods of distribution, CREW also files complaints with the FEC values it discovers violations of the FEC. Printiple in the companion of the feather.

violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities who violate campaign finance laws and deterring future violations of campaign finance law.

- 4. In order to assess whether an individual, candidate, political committee, or other regulated entity is complying with reducal campaign finance law, CREW meds the information somethical in remaints and disbussements regents that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, political committee, or other regulated entity fails to disclose campaign finance information in reports of receipts and disbussements required by the FECA.
- 5. CREW relies on the FECA's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if a candidate, political committee, or other regulated entity is complying with the FECA. The proper administration of the FECA's magnitude requirements inclining manufacting that all reports of receipts and disbursements required by the FECA are properly and timely filled with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.
- 6. Complainant Anne Weismann is the chief counsel of Citizens for Responsibility and Ethics in Washington, a citizen of the United States, and a registered voter and resident of the state of Maryland. As a registered voter, Ms. Weismann is entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Weismann is harmed vitum a continual committee, or other regulated capity fails to report

campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Weismann is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting her ability to review cumpaign finance information.

7. Complainant Wayne Jerry Phillips is a citizen of the United States and a registered voter and resident of the state of Louisiann. As a registered voter, Mr. Phillips is extitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Mr. Phillips is harmed when a candidate, political committee, or other regulated entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. at 19 (citation omitted). Mr. Philips is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting his ability to review campaign finance information.

# Respondents

8. U.S. Dry Cleaning Corporation is a Delaware corporation with its principal place of business in California. David Vitter is a United States Senator representing the State of Louisiana. David Vitter for U.S. Senate is a political committee and the principal campaign committee of David Vitter.

## **Factual Allegations**

On August 20, 2009, four officers/employees of U.S. Dry Cleaning
 Corporation, and their spouses, contributed a total of \$38,400 to David Vitter for U.S.
 Senste:

Name Title Date Amount

Robert Y. Lee	President/CEO	8/20/2009	\$4,800
Regina Lee	Homemaker	8/20/2009	\$4,800
Tim Denari	Chief Financial Officer	8/20/2009	\$4,800
Mary Denari	Homemaker	8/20/2009	\$4,800
Riaz Chautliani	Director of Acquisitions	8/20/2009	\$4,800
Donga Charikani	Homemaker	<b>8</b> i20/2009	\$4,800
Jamai Ogbe	Director of Einance	8/20/2009	\$4,800
Cymetria Ogbe	Homemaker	8/20/2009	\$4,800
Con David Vitton for	TIE Senste Amended Octob	n 150 Onesteele Bene	/T 20 2

- See David Vitter for U.S. Senate, Amended October 15th Quarterly Report (Jan. 28, 2010) (attached as Exhibit A).
- 10. Jamal Ogbe, the former Director of Finance for U.S. Dry Cleaning Corporation, told the New Orleans Times-Picayune that "the company was facing financial difficulties in 2009 and hoped that Vitter would help the firm gain access to federal stimulus financing or Small Business Administration Assistance. Ogbe said he was eventually reimbursed by his employer for his \$4.800 contribution." Bruce Alpert Sen. Lavid Vitter Giesna Ust With Denatlons From Dry Cleaning Financialus. New Orleans Times-Picayune (Apr. 8, 2010) (emphasis added) (attached as faxhibit B).
- 11. Corporate conduit contribution schemes like the one described by Mr. Ogbe rarely involve a single employee. Investigations of such schemes typically uncover a long-standing corporate practice of knowingly and willfully violating multiple provisions of FECA and FEC regulations in order to curry favor with federal officials and obtain an unfair advantage over competitors. See, e.g., MUR 5903 (PBSJ Corporation) (federal contractor utilized an institutionalized pattern of corporate reimbursement of federal campaign contributions over nearly two decades to attempt to influence the awarding of federal contracts); MUR 5665 (MZM, Inc.) (CEO devised and carried out over a three-year pariod a scheme to reiselizese energy employees and their spouses for \$78,000 in

illegal campaign contributions to two members of the House of Representatives in an effort to obtain federal funding for the corporation).

12. Here, given Mr. Ogbe's admission, it appears U.S. Dry Cleaning Corporation reimbursed four of its employees and their spouses for \$38,400 in contributions to David Vitter for U.S. Senate in an effort to obtain Senator Vitter's assistance in ebtaining federal stimulus funds.

#### **COUNT I**

- 13. FECA and FEC regulations both pankibit the making of a contribution in the name of a person other than the true source of the contribution. 2 U.S.C. § 441f; 11 C.F.R. § 110.4(b)(1)(i).
- 14. By reimburaing employees for contributions made to David Vitter for U.S. Seante, U.S. Dry Cleaning Corporation violated 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b)(1)(i).

#### COUNT I

- 15. FECA and FEC regulations both prohibit corporations from making contributions in connection with any federal election, including elections for the U.S. Senate. 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(a).
- 16. By reimbursing employees with corporate funds for contributions made to David Vitter for U.S. Senate, U.S. Dry Cleaning violated both 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(a).

## **COUNT III**

- 17. FECA and FEC regulations both prohibit a candidate or political committee from knowingly accepting or receiving a contribution from a corporation. 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(d).
  - 18. By accepting contributions from U.S. Dry Cleaning Corporation, David

and/or David Vitter for U.S. Senate may have violated both 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(d).

#### CONCLUSION

WHEREFORE, Citizens for Responsibility and Ethics in Washington, Anne Weismann, and Wayne Jerry Phillips request that the Federal Election Commission conduct an investigation into these allegations, dealers the respondents to have violated the Federal Election Campaign Act and applicable FEC regulations, and impose sanctions appropriate to these violations and take such further socion as may be appropriate, including referring this case to the U.S. Department of Justice for criminal proscecution of any violations of 2 U.S.C. §§ 441b(a) & 441f.

#### Verification

Citizens for Responsibility and Ethics in Washington and Anne Weismann hereby verify that the statements made in the attached Complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

Anne Weismann

Sworn and subscribed before me this 21st day of April, 2010.

The Delen

**Notary Public** 

Lisa Drew
District of Columbia, Notary Public
My Commission Expires
July 31, 2014

District of Columbia: SS

Sworn to and subscribed before me on the 21 day of Albut. 2010

7/31/2014

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**EXHIBIT B** 



# Sen. David Vitter cleans up with donations from dry cleaning executives

**By Bruce Alpert, Times-Picayune** April 08, 2010, 7:12PM

During a West Coast fund-raiser last summer, four officials with a California dry cleaning company and three of their spouses donated \$33,000 to Sen. David Vitter's re-election campaign.

The day before, Los Angeles attorney David Colubetik. who provided more than \$100,600 M Imancing for the firm, US Dry Cleaning Corp., gave Vitter's campaign \$1,000.

Willit multiple campaign contributions from executives at the same firm are common in national politics, generally they are made in support of a candidate from the company's home state or for a member with influence over issues important to the firm's bottom line. There are no such obvious links to the Louisians Republican and the dry cleaning business.

Jamei Ogbe, who was US Dry Cleaning's director of finance at the time of the fulfil-relear, said the company was facing financial difficulties in 2009 and hoped that Vitter would help the firm gain wasse to fulfine! stimulus financing or Small Business Administration Assistance. Ogbe said he was eventually reimbursed by his employer for his \$4,800 contribution. Sedanti company finance law prohibits combusement for such contributions.

Vitter, who opposed President Barnck Oberna's \$787 billion stimulus bill, would seem an odd choice to try to gain federal lineacing from a Democratic administration, although he does alt on the Senate Small Business Committee.

The Times Plcayum

Sen. David Vitter, R-La.

Vitter campaign spokesman Luke Bolar said "Neither Sen. Vitter nor his office ever made a requisit on belief of this company, that he believes that if the company Whitehell company Whitehell company whitehell company will be presented to the fall cultust of the law."

Some dry cleaning firms have urged the Environmental Protection Agency to slow efforts to phase out the chemical peachiomethylene, used by many, but not all in the industry. These have been no public statements by the sension about percularcethylene, but he has called on the EPA ast to ever-regulate the chemical industry, which has a large presence in Louisians.

On March 4, US Dry Cleaning filed for federal bankruptcy protection, while it continues to operate. Company CRO Nation: Lies, who along with his wife, Regime, coverbitted \$9,400 to vitter's exemption, settl in a bankruptcy count deposition that his entermy complains about 61% proprie and over and operates 20 try-cleaning shades with measure exempting \$55 million.

Lee and other company officials didn't respond to requests for a comment.

Two crediters, listed as lasing owed more than \$200,000 by the US Dry Cleaning Corp., said they here that the California bankruptcy court will saek repayment of any campaign donations made by company exacutives. Led, the firm's CEQ, also donated \$1,000 to Sen. John Thune; R-S.D., and \$5,000 to Thune's Heartland Values Political Action Committee.

Jerry Calin, OEU of IMAX Element, a Cliffornia-baseli credit card services company, was among those who donated to the Vitter campaign during the senator's 2009 West Coest fund-reising effort.

Cain, who describes himself as a regular GOP donor, said a Boston-based fund-raiser contacted him last summer and unlead if be mouth consider helping a Louisiana Republican who was at risk of lesing his seat to a Remarket. Cain said he was on the fence about giving, until Vitter personnily abound him and caked him to attend a California fund-raising dinner.

Cain donated \$2,400, and attended the "informal" dinner with "no speeches but "plenty of time" for personal discussions with the senstor. Cain said he "knew all about" Vitter's 2007 apology after his name appeared on the phone list of a Washington escurt service, but said he judges politicians about "what they do in their public responsibilities, not their private lives."

"And he's hum a guad Republicae symptor," Cain said.

Vitter, who this meek reported that he has \$5 million available for his 2010 Senate race, is being challenged by U.S. Rep. Charlie Melancon, a Democrat from Napoleonville.

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